

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	WC Docket No. _____
Section 63.71 Application of)	
Global Connection Inc. of America)	

SECTION 63.71 APPLICATION

Global Connection Inc. of America (Global or the Company) hereby seeks authorization, pursuant to Section 214(a) of the Communications Act of 1934, as amended (the Act), 47 U.S.C. §214, and Section 63.71 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §63.71, to discontinue its provision of resold domestic wireline services¹ in the states of Alabama, Arkansas, Georgia, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas. This discontinuance represents the next-to-final phase of Global's exit from wireline operations.² Following the completion of this process, Global will focus entirely upon its wireless services operations in the United States.

Global is currently authorized to operate as a reseller of local exchange and interexchange wireline telecommunications services in these ten states. The Company also is designated in these states as a wireline "Lifeline only" Eligible Telecommunications Carrier (ETC). In connection with the proposed discontinuance, Global is surrendering or otherwise

¹ Global's FCC Registration Number is 0010765329. The Company holds blanket domestic Section 214 authority from the Commission pursuant to operation of law. (47 C.F.R. § 63.01) Global does not provide (and is not discontinuing) international wireline service to any of the customers involved in this discontinuance.

² Global has been gradually discontinuing its operations over the past year. *See, e.g.*, WC Dkt. 19-54 (discontinuing interstate wireline services in Florida, Illinois, Indiana, Kansas, Missouri, Ohio and Oklahoma).

arranging for cancellation of its intrastate wireline authorizations and relinquishment of its *wireline* ETC designations.

Global also operates as a wireless carrier in over two dozen jurisdictions and holds international Section 214 authority.³ The Company does not propose to discontinue any of its wireless services in any states at this time. Global is not surrendering its international section 214 authority, as it will continue to offer wireless services that may include international components.

Global provides the following information pursuant to Section 63.71 of the Commission's Rules:

1. Name and Address of Carrier: Global is located at 5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093.

2. Date of Planned Service Discontinuance, Reduction or Impairment: The Company plans to discontinue the provision of these local exchange and long distance services beginning on February 1, 2020, subject to receipt of regulatory approvals.⁴ Global understands that this application will be automatically granted on the 31st day after public notice of filing unless the Commission notifies the Company to the contrary.

3. Points of Geographic Areas of Service Affected: Global proposes to discontinue the provision of these services throughout its territories in the following states: Alabama, Arkansas, Georgia, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

³ The Company was granted international Section 214 authority on May 7, 2004 in File No. ITC-214-20040421-00150.

⁴ The discontinuances are scheduled to occur over a period from February 1, 2020 through May 15, 2020. The Company intends to time the discontinuances based upon each customer's prepaid service period. Each customer has been sent a notice identifying the specific date on which his or her service discontinuance is scheduled.

4. Brief Description of Type of Service Affected: The Global service offerings affected by this discontinuance are comprised of prepaid wireline local exchange and long distance services. These services provide voice service over the public switched telephone network (PSTN).

After extensive assessment, Global has determined that its strategic business plans do not include continued provision of wireline services. The Company will focus upon provision of competitive wireless services throughout its territory. Global has a limited number of remaining wireline customers in these states to be adversely affected by the discontinuance. Moreover, consumers in these states will not be harmed generally by the discontinuance of these services because they will have access to a considerable number of alternative providers, including the incumbent local exchange carrier and competitive carriers offering wireline, wireless and Voice over Internet Protocol services.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers: Global has a total of fewer than 2,500 customers for wireline services in the states where it proposes to discontinue wireline operations. These customers have been provided at least sixty (60) days' advance notice, via first-class mail, of the discontinuance of service.⁵ A copy of the notice content, which complies with the requirements of 47 C.F.R. § 64.1120(e) is attached.

6. Whether the Carrier is Considered Dominant or Non-Dominant with Respect to the Service to Be Discontinued, Reduced or Impaired: Global is considered non-dominant with respect to the affected services.

In accordance with Section 63.71 of the Commission's Rules and concurrent with the filing of this Application, a copy of this Application is being mailed to the Special Assistant for


⁵ Customer notices were sent on November 25, 2019.

Telecommunications for the Secretary of Defense and the Governor of each of the states where services are being discontinued. Similarly, a copy is being submitted to the public utility commission for each of the affected states.

Additional questions regarding this application should be addressed to the undersigned.

Respectfully submitted,

Global Connection Inc. of America

By: 
Winafred Brantl
Kelley Drye & Warren LLP
3050 K Street, NW – Suite 400
Washington, DC 20007
Tel: (202) 945-6649
E-Mail: wbrantl@kelleydrye.com

Dated: November 26, 2019

Its Attorneys

VERIFICATION

STATE OF GEORGIA

§

§

COUNTY OF GWINNET

§

I, Eric Schimpf, state that I am the Chief Operating Officer of Global Connection Inc. of America (Global Connection); that I am authorized to make this Verification on behalf of Global Connection; that I have read the foregoing document; and that the statements in the foregoing document, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.



CERTIFICATE OF SERVICE

I hereby certify that the foregoing Section 63.71 Application is being served this 26th day of November, 2019 by delivering true and correct copies thereof, via U.S. mail or overnight courier, to the following persons at the addresses listed below.

Mr. Walter L. Thomas, Jr., Secretary Alabama Public Service Commission 100 North Union Street, Suite 850 Montgomery, Alabama 36104	Office of Governor Kay Ivey 600 Dexter Avenue Montgomery, AL 36130
Ms. Mary Loos, Secretary Arkansas Public Service Commission 1000 Center Street Little Rock, AR 72201	Office of Governor Asa Hutchinson State Capitol Room 250 500 Woodlane Ave. Little Rock, AR 72201
Mr. Reece McAlister, Executive Secretary Georgia Public Service Commission 244 Washington Street Atlanta, Georgia 30334	Office of Governor Brian Kemp 206 Washington Street 111 State Capitol Atlanta, GA 30334
Brandon M. Frey, Executive Secretary Louisiana Public Service Commission Post Office Box 91154 Baton Rouge, Louisiana 70821-9154	Office of Governor John Bel Edwards Office of the Governor PO Box 94004 Baton Rouge, LA 70804
Ms. Barbara Kunkle, Executive Secretary Michigan Public Service Commission PO Box 30221 Lansing, MI 48909	Office of Governor Gretchen Whitmer P.O. Box 30013 Lansing, Michigan 48909
Katherine Collier, Executive Secretary Mississippi Public Service Commission P.O. Box 1174 Jackson, MS 39215-1174	Office of Governor Phil Bryant P.O. Box 139 Jackson, MS 39205
Kim Campbell, Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, NC 27699-4300	Office of Governor Roy Cooper 20301 Mail Service Center Raleigh, NC 27699-0301
Jocelyn Boyd, Executive Director South Carolina Public Service Commission 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210	Office of Governor Henry McMaster State House 1100 Gervais Street Columbia, South Carolina 29201
Tory Lawless, Dockets & Records Tennessee Public Utility Commission 502 Deaderick Street, 4th Floor Nashville, TN 37243	Office of Governor Bill Lee State Capitol, 1st Floor 600 Dr. Martin L. King, Jr. Blvd. Nashville, TN 37243

Central Records Public Utility Commission of Texas PO Box 13326 Austin, TX 78711-3326	Office of Governor Greg Abbott P.O. Box 12428 Austin, Texas 78711-2428
Secretary of Defense Attn: Special Assistant for Telecommunications Pentagon Washington, D.C. 20301	



Winafred Brantl

Sample Customer Notices

General Notice (All States Except Michigan and Mississippi)

Michigan Notice

Mississippi Notice



November 25, 2019

NAME
ADDRESS
CITY, STATE ZIP
[Tel No. _____]

**Notice of Discontinuance of Your Telephone Service
by Global Connection Inc. of America**

Dear Global Connection Customer:

We regret to inform you that we are preparing to discontinue the provision of wireline local and long distance telephone services in ten states, including [State].¹ As a result, subject to receipt of required regulatory approvals, your Global Connection Real Home Phone service will be discontinued on or shortly after [DATE].²

In order to avoid a disruption in telephone service, you must make arrangements to receive service from a new telephone company before [DATE]. Please note, you will have one or more service renewal dates, the last being on [DATE]. If you continue to renew your service by those renewal dates, you will continue to have telephone service until your Last Service Date of [DATE].

As always, you may choose not to renew your service on or by your upcoming renewal date(s) and instead terminate your service at that time.

If your account is set up for Automatic Renewal, the service will be renewed on [DATE], unless you contact the Call Center at the number below.

If you do not arrange to have your telephone service provided by a new telephone company prior to your Last Service Date, you will lose telephone service (which means that you will be unable to make local calls including 911) and you may not be able to keep your current telephone number(s) with the new service provider. We urge you not to delay in arranging for a new service provider, as some carriers may require several weeks to install new services. To help avoid any lapse in your service, please check carefully that all services you currently receive from Global Connection, including both local and long distance services, are moved to your new carrier.

¹ Global is discontinuing these services in Alabama, Arkansas, Georgia, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

² **NC Customers:** Effective with this notice, Global will no longer make any changes to or reconnect any existing service or accept any orders for new service. **TX Customers:** Global will pay the "switchover" fees, if any, associated with the transfer of your regulated services to another service provider. The Company will comply with state law regarding return of deposits and credits to customers within 60 days of this notice; however, Global does not collect deposits.

ALL STATES EXCEPT MI AND MS



The names and telephone numbers of local telephone service companies, which also typically provide long distance service, should be listed in your telephone directory. Customer service representatives at these companies will help you to select services to most effectively replace your current Global Connection service. We also enclose a list of providers that may be operating in your area. If you arrange for new service before your Global Connection service is terminated and wish to keep your current telephone number(s), please be sure to address this with your new service provider.

Global Connection offers prepaid wireless service under the brand StandUp Wireless. You have the option of selecting an Unlimited Talk, Unlimited Text and 1 Gigabyte of Mobile data for Twenty dollars per month. The plan includes long distance calling, voicemail and standard features for a significant discount to your current landline service. If you would like to purchase this option as an alternative to your landline service, or have questions please call us at 800-551-7993.

The Federal Communications Commission requires us to provide you with the following notice in connection with its review of the proposed discontinuance:

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Global Connection Inc. of America. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

We thank you for being a Global Connection customer and remain committed to making your service transition as smooth as possible. If you have any further questions regarding the discontinuance of our services in the eleven states listed above, please contact Global Connection Customer Service at 800-551-7993.

Sincerely,
Global Connection Inc. of America

ALL STATES EXCEPT MI AND MS



Telephone Companies by State

Alabama	CenturyTel of Alabama, Frontier Communications, Windstream Alabama, AT&T	365 Wireless, LLC Access Point, Inc Comcast Digital Phone II, LLC Birch Telecom Go-Tel, LLC Wide Voice, LLC Media Link Telecom LLC Gulf South Telephone Louisiana IP, LLC Bandwidth.com CLEC, LLC
Arkansas	Windstream Arkansas, CenturyTel, Arkansas Tel, AT&T	365 Wireless, LLC Access Point, Inc. Bandwidth.com CLEC, LLC Cox Communications, Inc. Comcast Digital Phone II, LLC Charter Fiberlink dba Charter Telephone Service Talk America, Inc.(Windstream Corp.) XO Communications Services, Inc. Aero Communications, LLC
Georgia	Windstream Georgia, Fronter Communications, CenturyLink, AT&T	365 Wireless, LLC Access Point, Inc. Bandwidth.com CLEC, LLC Cox Communications, Inc. Comcast Digital Phone II, LLC Charter Fiberlink dba Charter Telephone Service Talk America, Inc.(Windstream Corp.) XO Communications Services, Inc. Aero Communications, LLC
Louisiana	CenturyLink, AT&T	Broadview Networks, Inc. 365 Wireless, LLC Access Point, Inc. Bandwidth.com CLEC, LLC Cox Communications, Inc. Comcast Digital Phone II, LLC Talk America, Inc.(Windstream Corp.) XO Communications Services, Inc. Aero Communications, LLC
North Carolina	Windstream North Carolina, AT&T, CenturyLink	Cox Communications, Inc. Comcast Digital Phone II, LLC Talk America, Inc.(Windstream Corp.) XO Communications Services, Inc. BullsEye Telecom, Inc. Broadview Networks, Inc. 365 Wireless, LLC Access Point, Inc. Bandwidth.com CLEC, LLC

ALL STATES EXCEPT MI AND MS



South Carolina	Windstream South Carolina, Frontier Communications, AT&T	ACN Communication Services, Inc. Comcast Digital Phone II, LLC Talk America, Inc.(Windstream Corp.) XO Communications Services, Inc. BullsEye Telecom, Inc. Broadview Networks, Inc. 365 Wireless, LLC Access Point, Inc. Bandwidth.com CLEC, LLC
Tennessee	CenturyTel, AT&T,	ACN Communication Services, Inc. Comcast Digital Phone II, LLC Talk America, Inc.(Windstream Corp.) XO Communications Services, Inc. BullsEye Telecom, Inc. Broadview Networks, Inc. 365 Wireless, LLC Access Point, Inc. Bandwidth.com CLEC, LLC
Texas	CenturyLink, AT&T, CenturyTel	ACN Communication Services, Inc. Comcast Digital Phone II, LLC Talk America, Inc.(Windstream Corp.) XO Communications Services, Inc. BullsEye Telecom, Inc. Broadview Networks, Inc. 365 Wireless, LLC Access Point, Inc. Bandwidth.com CLEC, LLC



5555 Oakbrook Parkway
Suite 620
Norcross, GA 30093



November 25, 2019

NAME
ADDRESS
CITY, STATE ZIP
[Tel No. _____]

**Notice of Discontinuance of Your Telephone Service
by Global Connection Inc. of America**

Dear Global Connection Customer:

We regret to inform you that we are preparing to discontinue the provision of wireline local and long distance telephone services in ten states, including Michigan.¹ As a result, subject to receipt of required regulatory approvals, your Global Connection Real Home Phone service will be discontinued on or shortly after [DATE]. Michigan state law requires that we notify you of this well in advance. You will receive another notice at least ninety (90) days prior to the discontinuance of your service.

In order to avoid a disruption in telephone service, you must make arrangements to receive service from a new telephone company before [DATE]. Please note, you will have multiple service renewal dates, the last being on [DATE]. If you continue to renew your service by those renewal dates, you will continue to have telephone service until your Last Service Date of [DATE].

As always, you may choose not to renew your service on or by your upcoming renewal date(s) and instead terminate your service at any of those times.

If your account is set up for Automatic Renewal, the service will be renewed on each renewal date through [DATE], unless you contact the Call Center at the number below.

If you do not arrange to have your telephone service provided by a new telephone company prior to your Last Service Date, you will lose telephone service (which means that you will be unable to make local calls including 911) and you may not be able to keep your current telephone number(s) with the new service provider. We urge you to begin to give thought to arrangements for a new service provider, as some carriers may require several weeks to install new services. To help avoid any lapse in your service, please check carefully that all services you currently receive from Global Connection, including both local and long distance services, are moved to your new carrier.

The names and telephone numbers of local telephone service companies, which also typically provide long distance service, should be listed in your telephone directory or on the

¹ Global is discontinuing these services in Alabama, Arkansas, Georgia, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.



Michigan Public Service Commission website at <https://www.michigan.gov/mpsc/>. Customer service representatives at these companies will help you to select services to most effectively replace your current Global Connection service. We also append a short list of providers that may be operating in your area. If you arrange for new service before your Global Connection service is terminated and wish to keep your current telephone number(s), please be sure to address this with your new service provider.

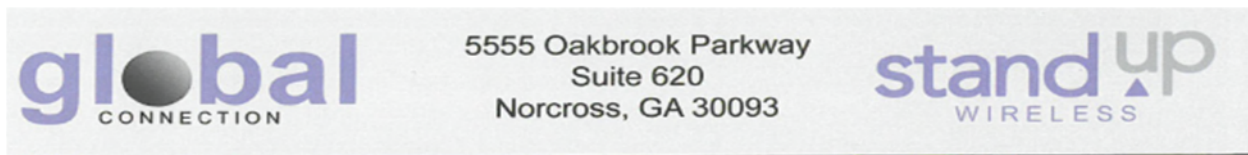
Global Connection offers prepaid wireless service under the brand StandUp Wireless. You have the option of selecting an Unlimited Talk, Unlimited Text and 1 Gigabyte of Mobile data for twenty dollars per month. The plan includes long distance calling, voicemail and standard features for a significant discount to your current landline service. If you would like to purchase this option as an alternative to your landline service, or have questions please call us at 800-551-7993.

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The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Global Connection Inc. of America. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

We thank you for being a Global Connection customer and remain committed to making your service transition as smooth as possible. If you have any further questions regarding the discontinuance of your services, please call Global Connection Customer Service at 800-551-7993.

Sincerely,
Global Connection Inc. of America



Telephone Companies Operating in Michigan

Incumbent local exchange carriers:

AT&T
CenturyTel
Frontier Communications

Competitive carriers:

Broadview Networks, Inc.
365 Wireless, LLC
Access Point, Inc.
Bandwidth.com CLEC, LLC
Cox Communications, Inc.
Comcast Digital Phone II, LLC
Talk America, Inc.(Windstream Corp.)
XO Communications Services, Inc.
Aero Communications, LLC



November 25, 2019

NAME
ADDRESS
CITY, STATE ZIP
[Tel No. _____]

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by Global Connection Inc. of America**

Dear Global Connection Customer:

We regret to inform you that we are preparing to discontinue the provision of wireline local and long distance telephone services in ten states, including Mississippi.¹ As a result, subject to receipt of required regulatory approvals, your Global Connection Real Home Phone service will be discontinued on or shortly after [DATE].

In order to avoid a disruption in telephone service, you must make arrangements to receive service from a new telephone company before [DATE]. Please note, you will have one or more service renewal dates, the last being on [DATE]. If you continue to renew your service by those renewal dates, you will continue to have telephone service until your Last Service Date of [DATE].

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¹ Global is discontinuing these services in Alabama, Arkansas, Georgia, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

MISSISSIPPI CUSTOMERS ONLY



The names and telephone numbers of local telephone service companies, which also typically provide long distance service, should be listed in your telephone directory and on the Mississippi Public Service Commission website at www.psc.ms.gov. Customer service representatives at these companies will help you to select services to most effectively replace your current Global Connection service. If you arrange for new service before your Global Connection service is terminated and wish to keep your current telephone number(s), please be sure to address this with your new service provider.

The Federal Communications Commission requires us to provide you with the following notice in connection with its review of the proposed discontinuance:

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Global Connection Inc. of America. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

We thank you for being a Global Connection customer and remain committed to making your service transition as smooth as possible. If you have any further questions regarding the discontinuance of our services in the eleven states listed above, please contact Global Connection Customer Service at 800-551-7993.

Sincerely,
Global Connection Inc. of America